

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MISSOURI**

IN RE:)
) Case No. 21-40268-drd13
MICHAEL LEE MOSLEY,)
)
Debtor.)

**MOTION TO DISMISS FOR FAILURE TO FILE 2022
TAX ASSESSMENT FORM**

Comes now the Clay County Collector, by and through her undersigned counsel, Bruce E. Strauss and for her motion to dismiss for failure to file the 2022 tax assessment form, states and alleges as follows:

1. That the debtor herein failed to file his personal property tax assessment form for 2022. As a result of this failure, the Clay County Collector has been unable to issue a tax statement for 2022. Taxes will be owed based upon the personal property owned by the Debtor as of January 1, 2022.

2. That during the course of the chapter 13 proceeding, the Debtor is required to keep his post-petition taxes current and not acquire new debt.

3. That the Clay County Collector is requesting that this case be dismissed unless the assessment form is filed immediately and the resulting personal property tax is paid.

WHEREFORE, the Clay County Collector prays for an order dismissing this case and for such further relief as the court deems just.

MERRICK, BAKER & STRAUSS, P.C.

By: /s/ bruce e. strauss

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CERTIFICATE OF SERVICE

I hereby certify that on March 16, 2023, a true and correct copy of the above and foregoing was electronically filed with the court using the CM/ECF system, which sent notification to all parties of interest participating in the CM/ECF system and via First Class U.S. Mail, properly addressed with postage prepaid, to:

Michael Lee Mosley
9739 N. Lewis Avenue
Kansas City, MO 64157

/s/ bruce e. strauss

BRUCE E. STRAUSS